

# BakerHostetler

Baker&Hostetler LLP

312 Walnut Street  
Suite 3200  
Cincinnati, OH 45202-4074

T 513.929.3400  
F 513.929.0303  
[www.bakerlaw.com](http://www.bakerlaw.com)

Kevin W. Kirsch  
direct dial: 513.929.3499  
[kkirsch@bakerlaw.com](mailto:kkirsch@bakerlaw.com)

January 21, 2020

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

*Re: Town & Country Linen Corp., et al. v. Ingenious Designs LLC, et al.,*  
Civil Action No. 18-cv-5075-LGS – Letter Motion Requesting to File Defendants’  
Answer and Counterclaims under Seal

Dear Judge Schofield:

This firm represents Defendants Ingenious Designs LLC (“IDL”), Joy Mangano, and HSN, Inc. (“HSN”) (collectively, “Defendants”) in the above-referenced action. We write in accordance with Your Honor’s Individual Rule I(C)(3) to respectfully request permission to file Defendants’ answer and counterclaims to Town & Country Linen Corp.’s and Town & Country Holdings, Inc.’s (collectively “Plaintiffs”) Second Amended Complaint (the “SAC,” *see Dkt. No. 47*) under seal.

With this Court’s permission Plaintiffs’ previously filed Exhibits F and G to the SAC under seal. *See Dkt. No. 46.* Defendants answer and counterclaims address the information in Exhibits F and G that Plaintiffs allege is confidential. Thus, it appears that Plaintiffs will request that certain information in Defendants’ answer and counterclaims be redacted from public disclosure. Defendants do not consider any information disclosed in its answer and counterclaims to be Defendants’ confidential information. Therefore, the justification for filing under seal is based on Plaintiffs alleged confidential information.

Accordingly, the Defendants respectfully request an order (1) permitting Defendants’ answer and counterclaims, due January 21, 2020, be filed under seal, (2) that Plaintiffs shall provide its proposed redactions to Defendants’ answer and counterclaims by January 27, 2020, and (3) Defendants shall file the public redacted version of its answer and counterclaims based on Plaintiffs’ redactions by January 29, 2020. A proposed order granting this motion to seal is attached hereto.

Honorable Lorna G. Schofield  
January 21, 2020  
Page 2

We appreciate Your Honor's consideration of this letter motion. The parties are available at the Court's convenience should Your Honor wish to discuss the letter motion to seal in greater detail.

Respectfully submitted,

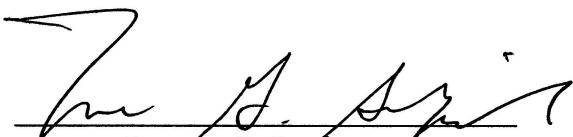


Kevin W. Kirsch

cc: Counsel of Record (via ECF)

Application GRANTED in part. The Court is in receipt of (1) Defendants' Answer and Counterclaims to Plaintiffs' Second Amended Complaint, sent by email to the Chambers inbox on January 21, 2020, and (2) Defendants' request above for this document to be filed under seal. Plaintiffs shall propose by email to the Chamber inbox any redactions to Defendants' Answer and Counterclaims by **January 27, 2020**. Defendants shall not file any public redacted version of the document until further Order.

Dated: January 22, 2020  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE